

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DENNIS CORHN JR.
PLAINTIFF,

VS.

JAY COOLEY,
MATT MACAULEY,
JARED BUCHIN,
(UNKNOWN) GIBSON,
JANE DOE#1 (IBC NURSE)
DEFENDANTS.

CASE NO. **1:22-cv-282**
HON. **Sally J. Berens**
MAG. **U.S. Magistrate Judge**

FILED - LN
March 25, 2022 2:10 PM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY eod / SCANNED BY 620326

DENNIS CORHN JR.#611013
BELLAMY CREEK CORR. FAC.
1727 W.BLUEWATER HWY.
IONIA, MICHIGAN 48846
PLAINTIFF, PRO SE

EXPARTE MOTION FOR THE APPOINTMENT
OF COUNSEL

NOW COMES, PLAINTIFF DENNIS CORHN JR., PURSUANT TO 28 USC 1915(d) REQUESTING THIS COURT TO APPOINT COUNSEL TO REPRESENT PLAINTIFF IN THIS CASE FOR THE FOLLOWING REASONS:

- 1) THE INJURIES PLAINTIFF SUFFERS WITH (AS A RESULT OF DEFENDANTS ALLEGED ACTIONS) HAVE CAUSED A VISUAL IMPAIRMENT LEAVING PLAINTIFF UNABLE TO ADEQUATELY READ OR WRITE WITHOUT EXPERIENCING SEVERE PAIN AND LOSS OF FOCUS.
- 2) THE ISSUES INVOLVED IN THIS CASE ARE COMPLEX IN FACT AND LAW. PLAINTIFF HAS FILED CLAIMS THAT ALLEGE MEDICAL NEGLIGENCE, RETALIATION, DELIBERATE INDIFFERENCE AND FEDERAL CONSPIRACY

WHICH WILL REQUIRE PLAINTIFF TO PRODUCE EXPERT WITNESSES AT TRIAL AND EXTENSIVE RESEARCH AND DISCOVERY, SOME OF WHICH PLAINTIFF IS NOT ALLOWED TO REVIEW. PLAINTIFFS CLAIMS ARE COMPLEX IN FACT AS PLAINTIFF ALLEGES THAT DEFENDANTS HAVE CAUSE HIM TO SUFFER A BRAIN ANEURYSM THAT REQUIRED BRAIN SURGURY AND PLACEMENT OF MEDICAL DEVICES THROUGHOUT HIS BRAIN. PLAINTIFF ALSO CLAIMS THESE SAME OFFICIALS SUBJECTED PLAINTIFF TO MULTIPLE FORMS OF RETALIATION AND INTIMIDATION IN ATTEMPT TO STOP PLAINTIFF FROM PURSUING THIS ACTION.

- 3) PLAINTIFF IS EXTREMELY LIMITED IN RESEARCH MATERIALS IN THE PRISON LIBRARY. THE PRISON LIBRARIES DO NOT PROVIDE ANY MEDICAL RESEARCH DATABASE OR DIRECTORY, NOR DOES THE LIBRARIES PROVIDE DIRECTORIES FOR EXPERT WITNESSES OR ATTORNEYS THAT MIGHT QUALIFY OR HELP PLAINTIFF IN THIS CASE.
- 4) PLAINTIFF HAS BEEN TURNED AWAY, IGNORED AND DENIED HELP FROM NUMEROUS ATTORNEYS THAT OTHERS HAVE SUGGESTED THAT HE CONTACT. PLAINTIFF HAS EVEN EXTENDED HIS SEARCH TO ACLU AND VARIOUS LAW SCHOOLS IN ATTEMPT TO OBTAIN A REFERRAL BUT HAS BEEN UNSUCCESSFUL IN ALL ATTEMPTS.
- 5) DESPITE PLAINTIFFS INJURIES AND IMPAIRMENT HE HAS BEEN DENIED ALL ACCESS TO THE PRISON LEGAL WRITER PROGRAM WHICH COULD OF PROVIDED THE HELP HE NEEDED.
- 6) PLAINTIFF STRONGLY BELIEVES THIS COMPLAINT SHOWS A PRIMA FACIE CASE AND THAT IT SHOWS MERIT TO HIS ALLEGATIONS. IF THIS COURT DENIES COUNSEL THEN THAT DENIAL WOULD ALTER THE SUBSTANCE OF HIS CLAIMS AND PLAINTIFF WOULD NOT HAVE A FAIR OR EQUAL OPPORTUNITY TO PURSUE THIS ACTION.

WHEREFOR, PLAINTIFF RESPECTFULLY REQUESTS THIS COURT TO APPOINT
COUNSEL TO PLAINTIFF IN THE ABOVE CAPTIONED CASE IN ORDER TO
PROVIDE PLAINTIFF A FAIR AND EQUAL OPPORTUNITY IN THIS COURT.

Respectfully submitted,

DATE:

1/5/22

Dennis Corhn Jr.

Dennis Corhn Jr.
Plaintiff, Pro se

Dennis Corhn Jr. Bell

Bellamy Creek Corr Facility

1727 W. Bluewater Hwy

Ionia, MI 48846

Screened by
USMS

U

3

La



US POSTAGE ® PITNEY BOWES

ZIP 48846 \$ 002.96⁰
02 4W
0000376849 MAR 23 2022

S. District Court
5 W Allegan
n sing, MI 48933